

ST. JOHNS COUNTY, FLORIDA

Board of County Commissioners

FIRE RESCUE

3657 GAINES ROAD
SAINT AUGUSTINE, FLORIDA
32084



PHONE: (904) 209-1700
FAX: (904) 209-1716

March 27, 2012

Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Received & Inspected
MAR 28 2012
FCC Mail Room

RE: St. Johns County, Florida
Request for Waiver

Enclosed herewith please find Request for Waiver of the narrowbanding deadline of January 1, 2013.

St. Johns County Florida requests said waiver on behalf of all of the Public Safety agencies and Government entities within St. Johns County, Florida which includes the following Licensees:

Saint Johns, County of
Saint Johns County Sheriff's Office
Saint Johns County Fire Rescue
St. Johns County Road & Bridge Department
St. Johns County Utility Department
St. Johns County Animal Control
St. Johns County Golf Course
City of Saint Augustine Beach Police Department
City of Saint Augustine Beach Public Works
City of Saint Augustine Police Department
City of Saint Augustine
City of Saint Augustine Fire Department
Town of Hastings, Florida



Thank you in advance for your consideration.

Respectfully submitted,

Gia M. Reynolds

Gia M. Reynolds
St. Johns County Fire Rescue
Communications Coordinator

Before the
Federal Communications Commission
Washington, D.C. 20554

Received & Inspected

MAR 28 2012

FCC Mail Room

In the Matter of:

LICENSEES:

Saint Johns, County of
3657 Gaines Rd.
St. Augustine, FL 32084

CALL SIGNS:

KTE750 WPMS707
KYD774 KGL556
WPMM639 KNIV203

St. Johns, County of
Road & Bridge
1625 SR 16
Saint Augustine, FL 32095

WPED245

St. Johns County Animal Control
1425 Old Dixie Hwy.
Saint Augustine, FL 32084

WQBG507

Saint Augustine Beach
Police Department
2300 A1A S
St. Augustine Beach, FL
32084

WPWU514

Saint Augustine Beach, City of
Public Works
2200 SR A1A South
St. Augustine Beach, FL 32080

WPUS449

St. Johns, County of
Sheriff's Office
4015 Lewis Speedway
St. Augustine, FL 32084

WQIH452 WNUU703
WPLR584 KIC244
WPFY991 WQIH312
WNYZ549 WPWE809

City of St. Augustine
Police Department
P.O. Box 210
75 King Street
St. Augustine, FL 32085-0210

KIE804

City of St. Augustine
P.O. Box 210
75 King Street
St. Augustine, FL 32085-0210

KNHZ952 WNNM835
WNQJ349 WNMT280
WHW766 WHW599
KD38676 WPOP350

City of St. Augustine	KXC997)
Fire Department)
P.O. Box 210)
75 King Street)
St. Augustine, FL 32085-0210)
)
St. Johns County Utility Dept.	WPWE860	WQDN324
1205 State Road 16)
St. Augustine, FL 32084)
)
St. Johns County Golf Course	WQBR499)
4900 Cypress Links Blvd.)
Elkton, FL 32033)
)
Town of Hastings	WPDY656)
6195 South main St., Suite A)
Hastings, FL 32145)

**REQUEST FOR WAIVER OF SECTION 90.209(b) OF THE COMMISSION'S
RULES FOR THE JANUARY 1, 2013 DEADLINE FOR MIGRATION TO
NARROWBAND TECHNOLOGY, PUBLIC SAFETY RADIO POOL**

Pursuant to Section 1.925 of the Rules of the Federal Communications Commission (Commission), the above referenced licensees ("Licensees") request a waiver of the Commission's requirement for the Licensees to complete migration to narrowband technology by January 1, 2013 in the Public Safety Radio Pool.

The Licensees recognize that the Commission has long emphasized its commitment to the January 1, 2013 deadline and requests waiver for extension of the deadline to June 30, 2013 due to extenuating circumstances to be detailed herein. It is noted that the Commission may waive its rules for good cause shown. In particular, the Commission may find that a waiver of its rules is appropriate where special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule where the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

Additionally, the Licensees claim unique factual circumstances and requests said Waiver as application of the rules(s) would be inequitable, unduly burdensome and contrary to the public interest.

I. INTRODUCTION

Saint Johns County, Florida, is located in Northeast Florida and is 609 square miles in area. The United States Census Bureau estimated 2010 population for Saint Johns County is 190,900. The service area includes unincorporated Saint Johns County, the City of St. Augustine, the City of St. Augustine Beach and Town of Hastings. Saint Johns County provides and receives mutual aid from, and is bordered by, Duval County (Jacksonville, FL) to the north (800MHz system), Clay County to the west (800MHz system), Flagler County to the south (800 MHz system), and Putnam County to the southwest (VHF system).

II. BACKGROUND

1. In 2003, the Public Safety Agencies within Saint Johns County, Florida, requested an analysis by the State of Florida Technology Office (S.T.O.) of the various public safety radio systems in use. In the S.T.O. report dated February 13, 2004, the immediate recommendation was to upgrade the existing systems to replace obsolete equipment which was outside the window of manufacturer's support. The recommended long term solution was an interoperable communications system to include all of the county's public safety agencies. The public safety agencies formed

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
II. BACKGROUND Cont.**

the Public Safety User Group committee consisting of representative from the St. Johns County Sheriff's Office, City of St. Augustine Police Department, City of St. Augustine Beach Police Department, City of St. Augustine Fire Department, St. Johns County Fire Rescue, and St. Johns County Office of the County Administrator.

2. In April, 2004, Saint Johns County, FL, contracted for communications services with RCC Consultants, Inc., Tallahassee, FL, and began Phase I improvements to the existing communications systems to provide adequate communications to the citizens of the county. These measures were considered temporary, as they did not improve the overall communications technology, interoperability and functionality of the various communications systems in use.

The Saint Johns County Sheriff's Office, Saint Johns County Fire Rescue, City of St. Augustine Police Department, City of St. Augustine Fire Department and City of St. Augustine Beach Police Department desired a plan to improve the public safety radio communications systems within their jurisdictions and to provide communications interoperability with surrounding local, state and federal agencies.

3. In the RCC Consultants, Inc. report issued to the Saint Johns County Public Safety User Group committee on January 17, 2005, it was noted that the existing VHF conventional systems used for the delivery of emergency communications for rapid response and potential life saving intervention would not provide effective interoperable communications within or outside of Saint Johns County, Florida.

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
II. BACKGROUND Cont.**

4. Pursuant to the RCC Consultants, Inc. report of January 17, 2005, Phase II, Interoperable Communications, was begun in 2006, with the licensing of the 15 NPSPAC 800MHz frequencies licensed under Call Sign WQFU649 on October 6, 2006.

5. As of March, 2007, the User Group committee, working closely with RCC Consultants, Inc., had researched and developed system specifications and a preliminary system design for a county wide public safety interoperable P25 800MHz trunked communications system. It was determined that existing infrastructure would not support the proposed system, requiring a complete replacement of infrastructure, including towers, as part of the Request for Proposal. The proposed county-wide interoperable, 800MHz P25 Trunked Communications System would be built from the ground up.

6. The financial crisis of 2007 – 2010, occurred simultaneously with the search for funding for the proposed communications system and made it difficult, if not impossible, to construct the proposed system under the Slow Growth Implementation Plan of August, 2006 within the construction deadline time frame and completion date of October 6, 2011. A Request for Waiver was submitted to the Federal Communications Commission for extension of the Slow Growth Implementation Plan and was dismissed by the Commission, without prejudice, on June 19, 2010 (File No.: 0004200349). The Licensee continued diligent effort to obtain funding for the new county-wide interoperable 800MHz P25 Trunked Communications System.

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
II. BACKGROUND Cont.**

7. Effective September 15, 2010, the Licensee was issued Radio Station Authorization by the Federal Communications Commission for 15 NPSPAC re-banded channels under call sign WQFU649. On July 12, 2011, it was discovered that when Sprint-Nextel filed with the FCC to re-issue Call Sign WQFU649 with the re-banded frequencies, an error was made under Sprint-Nextel DL8910438085. The FCC license subsequently issued showed a completion of the construction build out under the Slow Growth Implementation Plan for the then proposed 800 MHz P25 Trunked Communications System. Sprint-Nextel was immediately contacted and requested to resolve the error. The information was passed to the Sprint-Nextel Regulatory Department and on July 20, 2011, St. Johns County received the following response from Sprint-Nextel:

“The FCC recommends that the licensee wait until construction has been completed...then send a letter of explanation to the FCC, stating the actual construction occurred on x date, and reference the licensed call signs.” (SEE ATTACHMENT A)

III. CURRENT STATUS

1. A Request for Proposal SJC RFP# 11-84 – Towers & 800 MHz P25 Trunked Communications System was released on August 16, 2011.
2. During the summer of 2011, St. Johns County began identification of public and private lands suitable for construction of the 11 new towers to be included in

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
III. CURRENT STATUS (Cont.)**

the construction of the county-wide interoperable 800 MHz P25 Trunked Communications System to expedite the System tower construction process. All lands were identified, four parcels of private lands were purchased in October, 2011, and site work to be conducted by St. Johns County Construction Services Department began with initial ground work preparation of the sites. St. Johns County Construction Services developed and released a Request For Proposal for site development of the 11 parcels. Contracts have been awarded and site preparation work is currently underway with anticipated completion in February, 2012.

3. On December 6, 2011, after thorough ranking of Proposals received in response to the Request for Proposal, the St. Johns County Board of County Commissioners authorized the County to begin negotiations with Motorola Solutions, Inc. for RFP# 11-84.

4. On December 20, 2011, the St. Johns County Board of County Commissioners approved the contract for RFP# 11-84 between St. Johns County, FL and Motorola Solutions, Inc. for the purchase of Towers and county-wide, interoperable 800 MHz P25 Trunked Communications System with a construction deadline of December 27, 2012. The contract was signed by all parties on December 20, 2011.

5. The Public Safety Agencies in St. Johns County, Florida, will be the first to migrate to the 800 MHz P25 Trunked Communications System. All other

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

governmental departments within St. Johns County will be eligible to migrate to the 800 MHz P25 Trunked Communications System as their budgetary considerations will permit but are moving forward to be in compliance with the Narrowbanding Mandate by June 30, 2013.

IV. ADDITIONAL INFORMATION - REQUEST FOR WAIVER AND EXTENSION

St. Johns County, Florida, in anticipation of the completion of the county-wide, interoperable 800 MHz P25 Trunked Communications System occurring at the same time, or soon thereafter (in the event of any unforeseen construction delays) the Narrowbanding deadline of January 1, 2013, requests Waiver and Extension of the Narrowbanding mandate to June 30, 2013. The Licensees wish to retain their existing configuration and wideband communications during the time period following completion and system acceptance of the new 800 MHz P25 Trunked Communications System as a fall back option in the event of unforeseen issues with the new system. VHF frequencies and communications equipment which will be retained by the Licensees will be narrowbanded by June 30, 2013. During the extension time period, VHF communications operations will be at a minimal level due to primary use of the new county-wide interoperable 800 MHz P25 Trunked Communications System.

The Licensees request consideration due to the financial impact on the Licensees to narrowband all existing VHF frequencies, most of which will be relinquished (SEE ATTACHMENT B) to the Federal Communications Commission. An additional consideration is the financial burden involved in narrowbanding all existing VHF

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
IV. ADDITIONAL INFORMATION (Cont.)**

communications equipment, most of which will be rendered obsolete by the new county-wide interoperable 800 MHz P25 Trunked Communications System and removed from service. The estimated expense to narrowband the existing VHF frequencies and equipment is one million dollars.

As the Commission has ruled on February 21, 2012, reference DA 12-245, similar extenuating circumstances presented by County of St. Louis, Missouri, et al, warranted Waiver of the Narrowband deadline, St. Johns County, Florida believes the public interest would be served by granting the requested waiver and extension. Granting the request for waiver benefits all of the public safety agencies within Saint Johns County, Florida, which include the City of St. Augustine Beach Police Department, City of St. Augustine Police Department, City of St. Augustine Fire Department, Saint Johns County Sheriff's Office, Saint Johns County Fire Rescue, St. Johns County Road and Bridge Department and St. Johns County Utility Department.

The Licensees are committed to fully complying with the Federal Communications Commission Narrowbanding mandate for VHF frequencies and equipment to be retained and request Waiver and Extension to June 30, 2013.

We request consideration and consent of the Federal Communications Commission that St. Johns County's unique circumstances warrant a temporary extension of the current January 1, 2013 deadline.

Respectfully Submitted,

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES
SIGNATURE PAGE, ST. JOHNS COUNTY, FLORIDA**

AS TO ST. JOHNS COUNTY, FLORIDA:



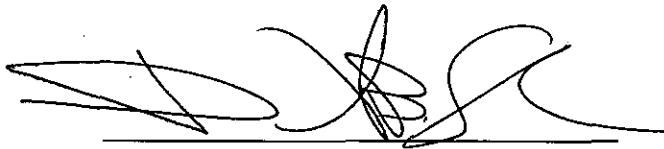
**Michael D. Wanchick
County Administrator
Saint Johns County, Florida
500 San Sebastian View
St. Augustine, FL 32084**

DATE: 3-25-12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

SIGNATURE PAGE, ST. JOHNS COUNTY, FLORIDA, SHERIFF'S OFFICE

AS TO ST. JOHNS COUNTY, FLORIDA, SHERIFF'S OFFICE:

A handwritten signature in black ink, appearing to read 'David B. Shoar', written over a horizontal line.


**David B. Shoar
Sheriff
St. Johns County Sheriff's Office
4015 Lewis Speedway
St. Augustine, FL 32084**

DATE: 3/14/12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

SIGNATURE PAGE, CITY OF ST. AUGUSTINE, FLORIDA

AS TO CITY OF ST. AUGUSTINE, FLORIDA:



**John P. Regan
City Manager
City of St. Augustine, Florida
P.O. Box 210
75 King Street
St. Augustine, FL 32085**

DATE: 3.14.12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

**SIGNATURE PAGE, CITY OF ST. AUGUSTINE, FLORIDA,
POLICE DEPARTMENT**

AS TO CITY OF ST. AUGUSTINE, FLORIDA, POLICE DEPARTMENT:



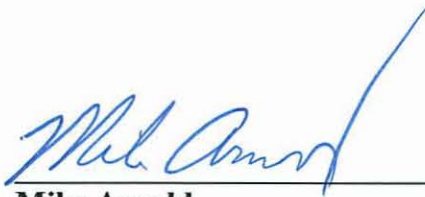
**Loren K. Lueders
Chief of Police
City of St. Augustine, Florida
151 King Street
St. Augustine, Fl. 32084**

DATE: 3/13/12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

**SIGNATURE PAGE, CITY OF ST. AUGUSTINE, FLORIDA,
FIRE DEPARTMENT**

AS TO CITY OF ST. AUGUSTINE, FLORIDA, FIRE DEPARTMENT:




**Mike Arnold
Fire Chief
St. Augustine Fire Department
101 Malaga Street
St. Augustine, FL 32084**

DATE: 3/19/12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

SIGNATURE PAGE, CITY OF ST. AUGUSTINE BEACH, FLORIDA,

AS TO CITY OF ST. AUGUSTINE BEACH, FLORIDA:


Max Royal
City Manager
City of St. Augustine Beach FL
2200 A1A South
St. Augustine Beach, FL 32080

DATE: 3/15/12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

**SIGNATURE PAGE, CITY OF ST. AUGUSTINE BEACH, FLORIDA,
POLICE DEPARTMENT**

AS TO CITY OF ST. AUGUSTINE BEACH, FLORIDA, POLICE DEPARTMENT:



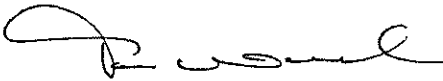
**Richard L. Hedges
Chief of Police
City of St. Augustine Beach, Florida
2300 A1A South
St. Augustine Beach, FL 32080**

DATE: 03/15/2012

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

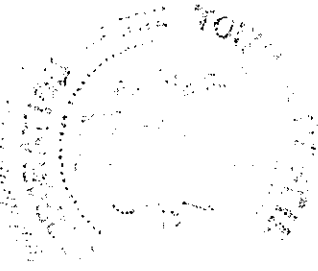
SIGNATURE PAGE, TOWN OF HASTINGS, FLORIDA

AS TO TOWN OF HASTINGS, FLORIDA:



**Tom Ward, Mayor
Town of Hastings, Florida
6195 South Main Street, Suite A
Hastings, Florida 32145**


DATE: 3-13-12



**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

SIGNATURE PAGE, ST. JOHNS COUNTY, FLORIDA, FIRE RESCUE

AS TO ST. JOHNS COUNTY, FLORIDA, FIRE RESCUE:

A handwritten signature in cursive script, appearing to read "Carl A. Shank". The signature is written in black ink and is positioned above a horizontal line.

**Carl A. Shank
Fire Rescue Chief
St. Johns County Fire Rescue
3657 Gaines Road
St. Augustine, FL 32084**

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

**SIGNATURE PAGE, ST. JOHNS COUNTY, FLORIDA,
ROAD AND BRIDGE DEPARTMENT
(PUBLIC WORKS)**

AS TO ST. JOHNS COUNTY, FLORIDA, ROAD AND BRIDGE DEPARTMENT:

A handwritten signature in black ink, appearing to read "Joe Stephenson", is written over a horizontal line.

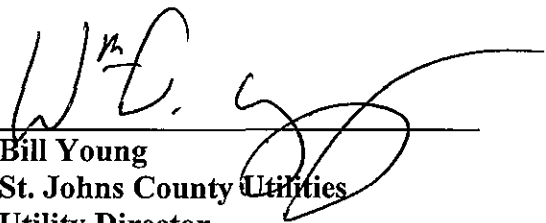
**Joe Stephenson
Public Works Director
St. Johns County
1625 State Road 16
St. Augustine, FL 32084**

DATE: 03/13/12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

**SIGNATURE PAGE, ST. JOHNS COUNTY, FLORIDA,
UTILITIES DEPARTMENT**

AS TO ST. JOHNS COUNTY, FLORIDA, UTILITIES DEPARTMENT:



**Bill Young
St. Johns County Utilities
Utility Director
1205 State Road 16
St. Augustine, FL 32084**

DATE: 3-13-12

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

ATTACHMENT A

From: Lee, Brenda B [FIN] [mailto:Brenda.Lee@sprint.com]
Sent: Wednesday, July 20, 2011 08:29
To: Gia Reynolds
Cc: Jeff Prevatt
Subject: RE: Closed DL8910438085 - St. Johns County Florida

Hey Gia,

It looks like our regulatory department finally received the below answer for you. If this does not answer your questions you can give the regulatory person a call at the below number for clarification.

The FCC recommends that the licensee wait until construction has been completed...then send a letter of explanation to the FCC, stating that actual construction occurred on x date, and reference the licensed call signs. Here's the address for the letter:

*Public Safety and Homeland Security Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325-7245*

Please call or email if you have any questions, concerns. Thanks!

Garrie
Garrie Losee
Legal Analyst
Sprint Nextel Corporation
703-592-7914 Desk

Thank you,

Brenda Lee

Project Manager/Spectrum Group, Sprint / Nextel
6575 The Corners Parkway, Norcross Ga. 30092
Cell 678-409-4279
Desk 678-823-6162
Fax 404-948-0904
brenda.lee@sprint.com

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

ATTACHMENT A - Continued

From: Gia Reynolds [mailto:greynolds@sjcfl.us]
Sent: Tuesday, July 12, 2011 2:44 PM
To: Lee, Brenda B [FIN]
Cc: Jeff Prevatt
Subject: Closed DL8910438085 - St. Johns County Florida

Brenda,

Hello -- it's been a long time since we corresponded; hope all is well with you. I need your help, please.

Apparently when Sprint-Nextel filed with the FCC to re-issue our license for WQFU649 last year, the filings triggered a Final Construction notification on WQFU649 AND WQFU240 (State Mutual Aid frequencies). We have not constructed our system, but our licenses are showing a Buildout date of 8/27/10, which is incorrect. We are ready to proceed with building a new communications system for both of these call signs, but are at a standstill until the licenses can be corrected to remove the Buildout as listed for 8/27/10.

I have attached the reference copies of the filings. There was a modification on 7-20-11 adding the re-banded frequencies, a notification of construction on 8/27/10 and, on 8/27/10, a modification which removed the old frequencies that were reverting to Sprint-Nextel. Also attached are reference copies of WQFU649 and WQFU240 issued September, 2010 after the Sprint-Nextel filings.

Can you help me? Perhaps someone in your licensing department can figure this one out and correct the Notification of Construction Buildout which was filed in error. Also noted on the license that was issued to us subsequent to your filings, the Construction Deadline had been changed from 10-6-11 to 8-6-11 and we would like to see that corrected to the original 10-6-2011 date listed prior to the licensing of the re-banded frequencies.

Please advise.

Thank you!
Gia M. Reynolds
St. Johns County Fire Rescue
Communications Coordinator
4455 Avenue A - Suite 100
St. Augustine, FL 32084
904.209.1710
904.823.3174 fax

**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

ATTACHMENT B

**SPECTRUM TO BE RELINQUISHED
BY JUNE 30, 2013**

ST. JOHNS COUNTY SHERIFF'S OFFICE

WQIH452	154.650			
WPLR584	153.845	158.790		
WPFY991	154.040	155.655		
WNYZ549	153.740			
WNUU703	156.075	159.060		
KIC244	154.650	154.770	154.845	155.190
	155.490	155.685	156.060	
WQIH312	151.250	155.580		
WPWE809	151.250	155.580	156.030	156.090

ST. JOHNS COUNTY FIRE RESCUE

KTE750	158.775	153.965
KYD774	154.310	151.115
	154.160	151.445
	154.175	
KNIV203	153.965	158.775
WYR859	158.745	153.875

ST. JOHNS COUNTY ANIMAL CONTROL

WQBG507	453.900	458.900
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ST. JOHNS COUNTY ROAD & BRIDGE

WPED245	159.120
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**Request for Waiver
Extension of the January 1, 2013 Deadline
For Migration to Narrowband Technology
SAINT JOHNS COUNTY, FLORIDA
PUBLIC SAFETY AGENCIES**

ATTACHMENT B - Continued

**SPECTRUM TO BE RELINQUISHED
BY JUNE 30, 2013**

CITY OF ST. AUGUSTINE FIRE DEPARTMENT

KXC997	153.950	154.385
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CITY OF ST. AUGUSTINE POLICE DEPARTMENT

KIE804	153.905	155.070
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